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Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

R.H., a minor, by and through her guardian
ad litem, Sheila Brown; ESTATE OF ERIC
JAY HAMES, by and through its personal
representative, Crystal Dunlap-Bennett,

Plaintiffs,

vs.

CITY OF REDDING, a public entity;
JOE ROSSI, an individual;
KIP KINNEAVY, an individual;
JAY GUTERDING, an individual;
BRETT LEONARD, an individual; and
DOES 5-20, inclusive,

Defendants.

CASE NO. 2:20-cv-01435-WBS-DMC

Hon. William B. Shubb

**STIPULATION AND ORDER
CONTINUING CERTAIN DATES**

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The parties, by and through their attorneys of record, stipulate as follows:

1. Counsel for Plaintiffs and counsel for Defendants City of Redding, Rossi, Guterding, and Leonard were scheduled to begin a 4-week trial on October 26, 2021 in Shasta County Superior Court in the matter of *Lang v. City of Redding, et al.* (Case No.).
2. In anticipation of trial, the parties were engaged in taking expert depositions and preparing pretrial documents. On October 22, 2021, the parties in the *Lang* matter were notified that the trial would be continued to a later date due to courtroom unavailability in Shasta County.
3. The parties still have to conduct discovery in this case, which was in part put on hold due to preparing for the *Lang* trial. Specifically, the parties have to conduct the following discovery:
 - a. The depositions of experts (2), since disclosures were recently exchanged in the case;
 - b. The depositions of Plaintiffs (2); and
 - c. The deposition of the 30(b)(6) for the City of Redding, which may involve multiple deponents (and which may prompt the preparation of a supplemental/rebuttal expert report from Plaintiffs' expert).
4. In order to complete the foregoing discovery, and in anticipation of the upcoming Thanksgiving holiday, the parties are requesting a modification to the current discovery schedule.
5. The current discovery schedule is as follows:

Discovery Cut-Off: November 12, 2021

Expert Witness Disclosures: October 15, 2021

Rebuttal Expert Witness Disclosures: October 29, 2021

Motion Filing Deadline: November 19, 2021

Final Pre-Trial Conference: January 31, 2021, at 1:30 p.m.

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6. The parties propose that the current discovery schedule be modified as follows:

Rebuttal Expert Witness Disclosures: November 5, 2021

Discovery Cut-Off: November 19, 2021

Motion Filing Deadline: December 20, 2021

Motion Hearing Date: January 24, 2022

Final Pre-Trial Conference: February 7, 2022, at 1:30 p.m.

DATE: October 26, 2021

TAYLOR & RING

By: /s/ Neil K. Gehlawat
John C. Taylor
Neil K. Gehlawat
Attorneys for Plaintiffs

DATE: October 26, 2021

ALLEN, GLAESSNER,
HAZELWOOD & WERTH, LLP

By: /s/ Dale Allen
Dale Allen
Attorneys for Defendants
City of Redding, Joe Rossi,
Jay Guterding, and Brett Leonard

DATE: October 26, 2021

GOYETTE, RUANO & THOMPSON, INC.

By: /s/ Martin Ruano
Martin Ruano
Caitlyn I. Andrijich
Attorneys for Defendant
Kip Kinneavy

1 Having reviewed the parties' stipulation and good cause appearing, the scheduling
2 order is modified as follows:

3 **IT IS SO ORDERED.**

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5 Rebuttal Expert Witness Disclosures: November 5, 2021

6 Discovery Cut-Off: November 19, 2021

7 Motion Filing Deadline: December 20, 2021

8 Motion Hearing Date: **January 24, 2022 at 1:30 p.m.**

9 Final Pre-Trial Conference: **March 14, 2022, at 1:30 p.m.**

10 The Jury Trial is reset for **May 17, 2022 at 9:00 a.m.**

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13 Dated: October 27, 2021



14 WILLIAM B. SHUBB

15 UNITED STATES DISTRICT JUDGE
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